

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**MASS ENGINEERED DESIGN, INC.**

**Plaintiff**

**v.**

**SPACECO BUSINESS SOLUTIONS, INC.**

**Defendant**

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**Civil Action No. 6:14-cv-00411**

**JURY TRIAL DEMANDED**

**PLAINTIFF’S ANSWER TO DEFENDANT’S AMENDED COUNTERCLAIMS**

Plaintiff, Mass Engineered Design, Inc. (“Mass”), by and through its undersigned counsel hereby answer the counterclaims of Defendant, SpaceCo Business Solutions, Inc. (“SpaceCo”), and state as follows:

**GENERAL COUNTERCLAIM ALLEGATIONS**

1. Admitted.

2. Admitted.

3. Admitted that this Court has jurisdiction over SpaceCo’s alleged counterclaims.

Mass denies that SpaceCo’s declaratory claims have any merit and further denies that SpaceCo is entitled to any declaratory relief.

4. Admitted that SpaceCo develops, manufactures and sells monitor arm products.

Mass is without sufficient information to admit or deny the remaining allegations of Paragraph 5 and, on that basis, denies same.

5. Admitted.

6. Admitted that Mass asserts that SpaceCo has infringed and continues to infringe both the ‘978 and ‘103 patents by its making, distributing, importing, offering for sale, selling,

advertising, and/or using of its multi-display monitor arm units and by contributing to the inducement of others to make, distribute, import, offer for sale, sell, advertise, and/or use infringing products. Mass denies asserting any requirement that such making, distributing, importing, offering for sale, selling, advertising, and/or using of the infringing products being limited to those configured for use with multiple monitors and other products.

7. Admitted that an actual and justiciable controversy exists between Mass and SpaceCo relating to the '978 and '103 Patents. Mass denies that denies that SpaceCo's declaratory claims have any merit and further denies that SpaceCo is entitled to any declaratory relief.

COUNTERCLAIM FOR DECLARATORY JUDGMENT OF INVALIDITY

8. Mass incorporates by reference the allegations contained in Paragraphs 1 through 7 of its Answer above.

9. Denied.

10. Denied.

COUNTERCLAIM FOR DECLARATORY JUDGMENT OF NON-INFRINGEMENT

11. Mass incorporates by reference the allegations contained in Paragraphs 1 through 10 of its Answer above.

12. Denied.

13. Denied.

JURY DEMAND

Mass acknowledges that SpaceCo has made a jury demand. Mass has likewise requested a trial by jury on all issues so triable.

PRAYER FOR RELIEF

Mass denies that SpaceCo is entitled to any of the relief that SpaceCo seeks in its prayer.

Date: December 21, 2015

Respectfully submitted,

By: /s/ Stephen F. Schlather

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*Attorneys for Plaintiff,*

*Mass Engineered Design, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

Date: December 21, 2015

/s/ Stephen F. Schlather

Stephen F. Schlather